

COMPARISON OF BACKGROUND DATA TO REMEDIAL INVESTIGATION (RI)
DATA
AT OPERABLE UNITS 1 AND 2

The agencies agree that multiple criteria must be used to determine whether remedial investigation (RI) results indicate exceedance of background. The primary criterion to be used at Operable Units 1 and 2 will be the Upper Tolerance Limit (UTL) of the appropriate background population as reported in the Background Geochemical Report. Individual analyte concentrations from the Operable Unit RI sampling activities will be compared to the UTL. If greater than 5% of the individual concentrations exceed the UTL, then contamination is indicated and further consideration is required. Criteria to be used include spatial, temporal, sampling and analysis nuances, and geochemical variability throughout the Operable Unit, and whether the contamination is known to be Rocky Flats waste related. The option to utilize inferential statistics as appropriate will be maintained, thereby bringing additional diagnostic capability. Factors to consider in making the decision to apply inferential statistics (e.g., ANOVA) include, but are not limited to, comparison of population means and variances, and inconclusive UTL comparisons. The agencies agree that the above criteria will be illustrated in the contaminants of concern flowchart.